

PATRICK J. MURCH  
Nevada Bar No. 10162  
BETTY J. FOLEY  
Nevada Bar No. 14517  
CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL  
5100 West Sahara Avenue  
Las Vegas, Nevada 89146  
Tel: (702) 799-5373  
Fax: (702) 799-5505  
[murchpj@nv.ccsd.net](mailto:murchpj@nv.ccsd.net)  
[foleybj@nv.ccsd.net](mailto:foleybj@nv.ccsd.net)  
*Attorneys for Clark County School District*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

TAMMIE KEITH-HENDERSON,

Plaintiff,

v.

CLARK COUNTY SCHOOL DISTRICT, a  
political subdivision of the State of Nevada,  
DOES I-V; and ROES VI-X,

Defendants.

Case No.: 2:19-cv-01448-RFB-DJA

**STIPULATION AND ORDER TO EXTEND  
REMAINING DISCOVERY DEADLINES**

**(First Request)**

Pursuant to LR IA 6-1, LR IA 6-2, and LR 26-3, the Clark County School District and Tammie Keith-Henderson stipulate and request that the Court enter an order extending the remaining discovery deadlines by 90 days. This stipulation and request are made in good faith, and not for purposes of delay.

Counsel for the parties engaged in a telephone conference on January 26, 2024 to satisfy the meet and confer requirement of the minute order (ECF No. 64) that was entered on January 25, 2024.

Pursuant to LR 26-3, the parties provide the following information:

**1. Discovery Completed.**

The School District served its initial disclosures on Keith-Henderson on August 31, 2023. It also served interrogatories and requests for production of documents on Keith-Henderson on September 27, 2023. Keith-Henderson has not made any disclosures, responded to any written discovery, or conducted any discovery as of the date of filing this stipulation.

**2. Remaining Discovery.**

The School District intends to take Keith-Henderson's deposition. Because Keith-Henderson has not yet provided any disclosures or discovery responses, however, the School District is currently unaware of any additional depositions and/or discovery that may be necessary. Tammie Keith-Henderson has been engaged in the production of witnesses, documents, and information as to her claims, and will have it completed on or before Friday, February 16, 2024.

This case has been through litigation for a period of time, and both counsel have worked with each other well to complete the demands of this discovery process. It has taken some time for Plaintiff's counsel to review the documents, and then discuss the remaining issues with her client so as to understand the status of their case, the issues remaining, the timeframes at issue at this time, and to complete all within the discovery period. In the fall of 2023, shortly after Counsel accepted this case, she initially assisted her client with the understanding of the status of this case in light of its history. With the client's continued employment with CCSD, an assessment of the remaining issues and moreover, the damages required careful review. Keith-Henderson intends to provide her testimony at her deposition, provide her list of witnesses, and remaining documents.

**3. Reasons Why Discovery Not Completed.**

Keith-Henderson's counsel has been undergoing recurring medical treatment that has impeded her ability to complete the initial disclosures and discovery responses. This has caused her to work on a reduced schedule. Counsel have been in regular communication about this litigation since August 2023, and have agreed to eight extensions of time prior to seeking to

1 extend the remaining discovery deadlines. Even as recently as January 5, 2024, Plaintiff's  
2 counsel contacted opposing counsel to advise him of the status of the discovery production, and  
3 left a message as instructed by his staff.

4 **4. Proposed Schedule for Completing Discovery.**

5 The parties propose the following schedule for completing discovery:

6 **Discovery Cut-Off Date:** May 14, 2024.

7 **Dispositive Motions:** June 12, 2024.

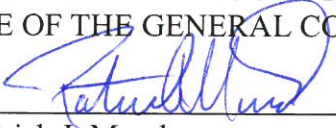
8 **Pre-Trial Order:** July 15, 2024.

9 Dated: February 8, 2024.

Dated: February 8, 2024.

10 CLARK COUNTY SCHOOL DISTRICT  
11 OFFICE OF THE GENERAL COUNSEL

HOLMAN LAW OFFICE

12 By:   
13 Patrick J. Murch  
14 Nevada Bar No. 10162  
15 5100 West Sahara Avenue  
16 Las Vegas, Nevada 89146  
17 Attorney for Clark County School District

By: /s/ Kristina S. Holman  
Kristina S. Holman  
Nevada Bar No. 3742  
8275 South Eastern Avenue, Suite 215  
Las Vegas, Nevada 89123  
Attorney for Tammie Keith-Henderson

18 **ORDER**

19 **IT IS SO ORDERED.**

20   
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: 2/9/2024  
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